

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

|  |   |                            |
|--|---|----------------------------|
| <b>RICHARD WAYNE WRIGHT, SR.,</b>        | ) |                            |
|  | ) |                            |
| <b>Plaintiff,</b>                        | ) |                            |
|  | ) |                            |
| <b>vs.</b>                               | ) | <b>CIVIL ACTION NO.</b>    |
|  | ) | <b>2:05-CV-439-WHA-CSC</b> |
|  | ) |                            |
| <b>SYLVESTER NETTLES, <i>et al.</i>,</b> | ) |                            |
|  | ) |                            |
| <b>Defendants.</b>                       | ) |                            |

**AFFIDAVIT OF WILLIAM SANDERS, M.D.**

**STATE OF ALABAMA**

**COUNTY OF \_\_\_\_\_**

Before me, \_\_\_\_\_, a Notary Public in and for said County and State of Alabama at Large, personally appeared WILLIAM SANDERS, who being known to me and being by me first duly sworn, deposes and says under oath as follows:

“My name is William Sanders. I am a licensed psychiatrist, and I am over the age of twenty-one (21). I am employed by Mental Health Management Services, Inc. (“MHM”). I have never been employed by the State of Alabama or the Department of Corrections. MHM contracts with the Alabama Department of Corrections to provide mental health treatment. I am personally familiar with all facts set forth in this affidavit.

Prior to his transfer to Ventress Correctional Facility, Mr. Wright was incarcerated at Bullock Correctional Facility. I have reviewed the Complaint and the Amended Complaint. Furthermore, I have reviewed Mr. Wright’s Interdisciplinary Progress Notes and the treatment plan prescribed for

Mr. Wright's mental health treatment.

In his Amended Complaint, Mr. Wright contends that the psychotropic drugs which I had prescribed caused him to suffer many unexplained physical ailments. I prescribed Haldol 2mg and Lithium 600mg, two low-level psychotropic drugs which are well within the accepted therapeutic range for his condition.

I am aware that an Involuntary Medication Hearing was conducted regarding Mr. Wright on or about August 20, 2002; I took no part in such hearing nor did I make any recommendation of forced medication. At no time was it ever requested of me to produce the paperwork associated with this hearing.

Based on my review of Mr. Wright's medical records and my personal knowledge of the treatment I provided, it is my opinion that all of Mr. Wright's mental health complaints I treated were evaluated and treated in an appropriate and timely fashion. At all times, MHM employees exercised the same degree of care, skill, and diligence as other similarly situated health care providers would have exercised under the same or similar circumstances. Simply, it is my opinion that the appropriate standard of care was adhered to at all times in providing mental health treatment to Mr. Wright.

At no time have I or any MHM employees denied any needed mental health treatment, nor have I or any MHM employees ever acted with deliberate indifference to any serious medical need of Mr. Wright."

Further Affiant saith not.

/s/William Sanders

William Sanders, M.D.

SWORN TO AND SUBSCRIBED before me this \_\_\_\_\_ the day of \_\_\_\_\_, 2006.

\_\_\_\_\_  
Notary Public

My Commission expires:\_\_\_\_\_